

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

**FTX Trading Ltd., et al., Debtors.**

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

RECEIVED  
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DISTRICT OF DELAWARE

**EMERGENCY MOTION OF HEJIA ZHAO (PRO SE) TO CONFIRM ELIGIBILITY FOR  
SEPTEMBER 30, 2025 DISTRIBUTION  
AND MOTION FOR SHORTENED NOTICE UNDER LOCAL RULE 9006-1(e)**

Related to D.I. 32384

Movant Hejia Zhao (the "Movant"), appearing pro se and identified in the Debtors'/Trust's claims and distribution systems as Customer Code 2696746, respectfully submits this Emergency Motion to confirm Movant's inclusion in the September 30, 2025 distribution and, pursuant to Del. Bankr. L.R. 9006-1(e), to shorten notice so the Court may resolve this limited request in time. This Motion relates to Movant's prior filing at D.I. 32384, which remains pending.

**I. RELIEF REQUESTED**

1. Movant requests entry of an order directing the FTX Recovery Trust (the "Trust") to file a notice on the docket by September 24, 2025 at 12:00 p.m. Eastern Time (noon) confirming that Customer Code 2696746 is included in the distribution scheduled for September 30, 2025 via Kraken (Movant's selected DSP).
2. If no response or objection to this Motion is filed by the foregoing deadline, Movant requests that the Court grant the Motion without a hearing and direct the Trust to include Customer Code 2696746 in the September 30, 2025 distribution via Kraken.

3. Movant requests that the Court consider this Motion on the papers; in the alternative, Movant requests the earliest available hearing before September 30, 2025.

4. Consent Statement (Del. Bankr. L.R. 9013-1(f)). Movant consents to entry of a final order by this Court on this Motion.

## **II. JURISDICTION, VENUE, AND STATUTORY BASIS**

5. The Court has jurisdiction under 28 U.S.C. §§ 157 and 1334; venue is proper under 28 U.S.C. §§ 1408–09. This is a core proceeding under 28 U.S.C. § 157(b). Relief is authorized by 11 U.S.C. §§ 105(a), 1142(b), and the Court’s inherent authority to administer plan distributions.

## **III. FACTUAL BACKGROUND**

6. Movant is a Class 5A customer and selected Kraken as Movant’s Distribution Service Provider (DSP).

7. All distribution prerequisites were completed on or before August 7, 2025—including KYC verification, tax form submission, and Kraken onboarding—as confirmed by FTX Support and Kraken (Exhibits A–B).

8. The FTX Customer Claims Portal reflects all steps complete (though Step 9 still shows a prior “5/30” status) (Exhibit C).

9. On or about September 20, 2025, similarly situated customers (Chinese passports with Hong Kong tax residency; Kraken DSP) received “FTX Recovery Trust – Completed Distribution to DSP” emails and saw confirmations in Kraken; Movant has not received any comparable confirmation (Exhibit D).

10. Multiple inquiries to FTX Support and to Trust counsel yielded only template, non-substantive responses (Exhibit E–F). With the September 30 distribution imminent, a date-certain confirmation is required to avoid erroneous omission and to maintain parity among similarly situated creditors.

## **IV. BASIS FOR RELIEF AND SHORTENED NOTICE**

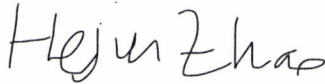
11. The requested order is narrow and ministerial: the Trust need only confirm on the record that Movant—who satisfied all prerequisites—will be included in the imminent distribution. Expedited relief is warranted in light of the fixed September 30 date and the Trust’s prior non-substantive replies.

12. Shortened Notice (Del. Bankr. L.R. 9006-1(e)). Cause exists to shorten notice: (i) the distribution date is imminent; (ii) Movant's prerequisites were completed by August 7, 2025; (iii) similarly situated creditors already received inclusion confirmations; and (iv) a shortened, date-certain response avoids prejudice and needless motion practice. The requested noon, September 24, 2025 response deadline also aligns with Local practice permitting a certificate of no objection 24 hours after the deadline, allowing prompt entry of the proposed order before September 30.

**WHEREFORE, Movant respectfully requests that the Court enter the Proposed Order attached hereto and grant such other and further relief as is just and proper.**

Dated: September 22, 2025

Wilmington, Delaware (by mail)

A handwritten signature in black ink, appearing to read "Hejia Zhao". The signature is fluid and cursive, with the first name "Hejia" and last name "Zhao" clearly distinguishable.

Hejia Zhao (pro se)

Customer Code: 2696746

Mood Lyndhurst, [Apt Redacted], 38 Lyndhurst Terrace, Central, Hong Kong

Email: [hz263@cornell.edu](mailto:hz263@cornell.edu)

Tel: +86-18924671668

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

**FTX Trading Ltd., et al., Debtors.**

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

**ORDER GRANTING EMERGENCY MOTION TO CONFIRM ELIGIBILITY FOR  
SEPTEMBER 30, 2025 DISTRIBUTION  
AND MOTION FOR SHORTENED NOTICE UNDER LOCAL RULE 9006-1(e)**

Upon the motion (the "Motion") of Hejia Zhao (pro se), Customer Code 2696746; and good cause appearing; it is hereby ORDERED that:

1. On or before September 24, 2025 at 12:00 p.m. Eastern Time (noon), the FTX Recovery Trust (or its administrator) shall file a notice on the docket confirming whether Customer Code 2696746 is included in the September 30, 2025 distribution via Kraken.
2. If no response or objection to the Motion is filed by that deadline, the Motion is DEEMED GRANTED without a hearing and the FTX Recovery Trust is DIRECTED to include Customer Code 2696746 in the September 30, 2025 distribution via Kraken.
3. The Court retains jurisdiction to enforce and interpret this Order.

Dated: \_\_\_\_\_, 2025

Wilmington, Delaware

\_\_\_\_\_  
The Honorable Karen B. Owens

United States Bankruptcy Judge



## **CERTIFICATE OF SERVICE**

I, Hejia Zhao, certify that on September 22, 2025, I caused the foregoing Emergency Motion, the Proposed Order, and any accompanying exhibits to be served by email on the following:

### **U.S. Trustee – District of Delaware**

- Juliet M. Sarkessian – juliet.m.sarkessian@usdoj.gov
- Benjamin A. Hackman – benjamin.a.hackman@usdoj.gov
- David Gerardi – david.gerardi@usdoj.gov

### **Counsel to the FTX Recovery Trust – Sullivan & Cromwell LLP**

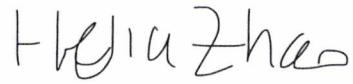
- Andrew G. Dietderich – dietdericha@sullcrom.com
- James L. Bromley – bromleyj@sullcrom.com
- Brian D. Glueckstein – gluecksteinb@sullcrom.com
- Alexa J. Kranzley – kranzleya@sullcrom.com

### **Delaware Counsel to the Trust – Landis Rath & Cobb LLP**

- Adam G. Landis – landis@lrclaw.com
- Kimberly A. Brown – brown@lrclaw.com
- Matthew R. Pierce – pierce@lrclaw.com
- Matthew B. McGuire – mcguire@lrclaw.com

Request for Consent / Reservation: By this certificate and the cover email, Movant requests that counsel confirm consent to service by email for the foregoing papers. If any Service Party withholds consent or the Court requires alternate service, Movant will promptly cure by effecting service consistent with FRBP 7004/9014.

I declare under penalty of perjury that the foregoing is true and correct.

A handwritten signature in black ink, appearing to read "Hejia Zhao". The signature is written in a cursive, flowing style.

Hejia Zhao (pro se)

Customer Code: 2696746

Email: [hj263@cornell.edu](mailto:hj263@cornell.edu)

Tel: +86-18924671668

## **EXHIBIT INDEX**

Exhibit A — Email (Kraken) confirming DSP onboarding (dated on/before Aug. 7, 2025)

Exhibit B — Email(s) from FTX Support confirming KYC and tax form completion (on/before Aug. 7, 2025)

Exhibit C — FTX Claims Portal screenshots showing all steps completed (Step 9 still showing 5/30)

Exhibit D — Redacted copies/screenshots of other creditors' "Completed Distribution to DSP" emails (received Sept. 20, 2025)

Exhibit E — Email to FTX Trust counsel no response as of filing

Exhibit F — Email threads to FTX support showing non-substantive/template responses

Exhibit A — Email (Kraken) confirming DSP onboarding (dated on/before Aug. 7, 2025)

Confirmation and Next Steps - Upcoming FTX distribution External Inbox x

Kraken <no-reply@email.kraken.com> Unsubscribe  
to me ▾

Thu, Aug 7, 9:21 PM



Hi Hejia,

We're grateful that you've chosen Kraken as your preferred platform for receiving funds related to the FTX distribution.

Here's where we are in the process:

- ☒ You've created your Kraken account
- ☒ Your Kraken and FTX accounts have been successfully linked
- ☒ Your Kraken account is properly verified
- ☐ All that's left is to wait for FTX to distribute the funds

In terms of timeline and when to expect FTX to distribute the funds, updates will be posted on the [FTX Claims Portal](#) and on the @FTX\_Official X account as soon as the information is available.

Exhibit B — Email(s) from FTX Support confirming KYC and tax form completion (on/before Aug. 7, 2025)

Shandie (Please use [support.ftx.com](https://support.ftx.com))

Jul 31, 2025, 02:18 PDT

Hi there,

Just got information from our KYC team that your residential address has already been updated.

As for your Step 8, once you have onboarded with a Distribution Service Provider, this selection cannot be changed. You can find more Distribution information here: <https://support.ftx.com/hc/en-us/articles/33190623459092-General-Information-on-Distribution-Service-Providers>

Thank you,

FTX Customer Support



Sherry Zhao <hz263@cornell.edu>  
to FTX

Aug 7, 2025, 10:55 PM ☆

Hi Jason:

Thank you for your response. I received confirmation from Kraken that my KYC and linking to FTX is properly done. However on my Step 9 dashboard it's still showing May 30 distribution info, would this be updated to Sep 30 distribution soon? Thanks!

Best,  
Hejia

**Distributions Dashboard**  
Values in U.S. Dollars (USD)

**May 30th Distribution - Non-Convenience Class Customers**

Distribution Method	BKGo	
Est. Distribution Date	TBD	
Claim Classification	TBD	
Claim Status	Disputed	

**Distribution Calculation**

Claim Amount	TBD	
Principal Recovery %	TBD	
<b>Total Principal Recovery</b>	<b>TBD</b>	

**Post-Petition Interest Distribution**

(Tax Withholding)	TBD	
(Forfeited Distribution)	TBD	

**Steps:**

- STEP 1: Initiate Account Owner Authentication
- STEP 2: Verify Identity of the Original FTX Account Owner
- STEP 3: KYC
- STEP 4: View Account Balances
- STEP 5: View Your Proof of Claim Status
- STEP 6: Voting
- STEP 7: Distributions - Tax Requirements
- STEP 8: Distributions - Select Provider
- STEP 9: Distribution Amounts - Summary

Jason Gunn (Please use [support.ftx.com](https://support.ftx.com))

Aug 7, 2025, 17:52 PDT

Hello

Please continue to monitor the FTX Claims Portal, the dates will update once everything is confirmed

Kindly check Step 9 for your Est. Distribution Date, the Court-approved Chapter 11 Plan of Reorganization (the "Plan") became effective on January 3, 2025.

For more information regarding Distributions, please refer to <https://support.ftx.com/hc/en-us/articles/33190623459092-General-Information-on-Distribution-Service-Providers>

If you have completed Steps 3 to 8, the next step is to wait for updates regarding your distribution.

Thank you,

FTX Customer Support

Exhibit C — FTX Claims Portal screenshots showing all steps completed (Step 9 still showing 5/30)

STEP 1

Initiate Account Owner Authentication

STEP 2

Verify Identity of the Original FTX Account Owner

STEP 3

KYC

STEP 4

View Account Balances

STEP 5

View Your Proof of Claim Status

STEP 6

Voting

STEP 7

Distributions - Tax Requirements

STEP 8

Distributions: Select Provider

STEP 9

Distribution Amounts - Summary

Distributions Dashboard

Values in U.S. Dollars (USD)

May 30th Distribution - Non-Convenience Class Customers

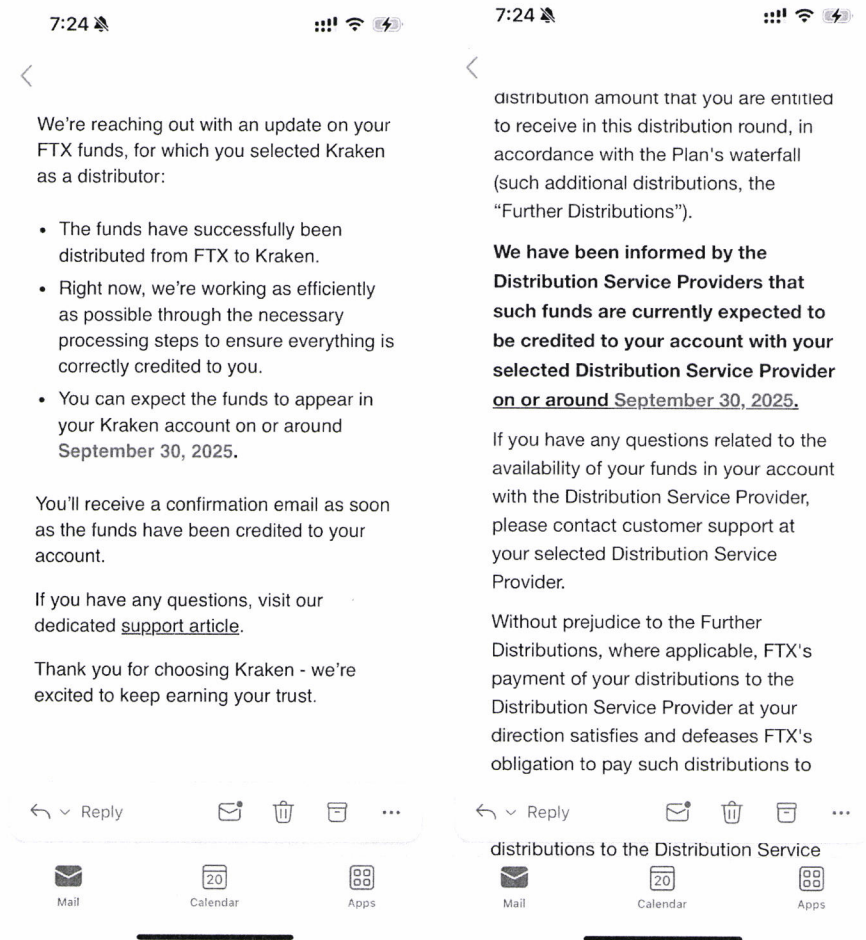
Distribution Method	BitGo	
Est. Distribution Date	TBD	ⓘ
Claim Classification	TBD	ⓘ
Claim Status	Disputed	ⓘ

Distribution Calculation

Claim Amount	TBD	ⓘ
Principal Recovery %	TBD	ⓘ
Total Principal Recovery	TBD	ⓘ



Post-Petition Interest Distribution	TBD	ⓘ
(Tax Withholding)	TBD	
(Forfeited Distribution)	TBD	ⓘ

Exhibit D — Redacted copies/screenshots of other creditors' "Completed Distribution to DSP" emails (received Sept. 20, 2025)





## Exhibit E — Email to FTX Trust counsel no response as of filing

Courtesy Notice re D.I. 32384; Order D.I. 32720 — Request to Confirm Inclusion of Customer Code 2696746 in 9/30 Distribution  

Sherry Zhao <hz263@cornell.edu>

 Sun, Sep 21, 12:34 AM (1 day ago) ☆ ↶ ⋮

to pierce, brown, landis, kranzleya, dietdericha, gluecksteinb, bromleyj, juliet.m.sarkessian, david.gerardi, benjamin.a.hackman ▾

Counsel for the FTX Recovery Trust:

This is a courtesy notice that I filed D.I. 32384 (attached). The Court entered Order D.I. 32720 ("Order Setting Status Conference," entered Sept. 16, 2025), setting a status conference for October 23, 2025 and listing my filings as related.

I am a pro se Class 5A customer (Customer Code 2696746). I completed the record-date prerequisites—KYC, tax form, and DSP onboarding with Kraken—on or before August 15, 2025, confirmed by both FTX support and Kraken.

I understand that certain FTX customers with Chinese passports and Hong Kong tax residency received an email titled "FTX Recovery Trust – Completed Distribution to DSP" on September 20, 2025, confirming inclusion in the September 30, 2025 distribution. Their Kraken accounts also confirm that "the funds have successfully been distributed from FTX to Kraken." I have not yet received a similar confirmation.

Request: Please confirm by September 22, 2025, 5:00 p.m. ET that Customer Code 2696746 is queued for the September 30, 2025 distribution via ordinary DSP mechanics. If not, please identify any specific unmet record-date requirement or legal bar so that I can cure promptly; I will provide any documentation you require.

If I do not receive a response by the deadline above, I will promptly seek appropriate relief from the Court to safeguard inclusion in this distribution.



## Exhibit F — Email threads to FTX support showing non-substantive/template responses

Sherry Zhao <hz263@cornell.edu>  
to FTX, FTXInfo, ftxquestions ▾

Sun, Sep 21, 5:14 PM (22 hours ago) ☆ ↶ ⋮

Hello FTX Support and Kroll Claims Support,

I'm writing to request confirmation that my account (**Customer Code 2696746**) is queued for the **September 30, 2025** distribution via ordinary DSP mechanics (**Kraken**).

### Status

- I completed all record-date prerequisites—KYC, tax form, and **DSP onboarding with Kraken**—on or before **August 15, 2025** (confirmed by FTX Support and Kraken).
- I understand that some FTX customers with Chinese passports and Hong Kong tax residency received an email on **September 20, 2025** titled "**FTX Recovery Trust – Completed Distribution to DSP**," and their Kraken accounts reflect that "**the funds have successfully been distributed from FTX to Kraken**." I have not yet received a similar confirmation.

### Request

Please confirm by **September 22, 2025, 5:00 p.m. ET** that **Customer Code 2696746** is queued for the **September 30, 2025** distribution. If not, please identify any unmet record-date requirement or legal bar so I can cure promptly; I will provide any documentation you require.

Thank you for your help.

Best regards,

Hejia Zhao

Customer Code: 2696746

Ella (Please use [support.ftx.com](https://support.ftx.com))

Sep 21, 2025, 04:15 PDT

Hi there,

You can find updates regarding Distributions on official FTX sources such as @FTX\_Official on X, <https://support.ftx.com/>, and correspondence from official email addresses <https://support.ftx.com/hc/en-us/articles/19223337707412-Official-Email-Addresses> as they become available. Please check step 9 from time to time.

Thank you,

FTX Customer Support

Ella (Please use [support.ftx.com](https://support.ftx.com))

Sep 21, 2025, 05:59 PDT

Hey there,

Thank you for reaching out to us. We appreciate your inquiry and apologize for not having an immediate answer right now. You can find updates regarding Distributions on official FTX sources such as @FTX\_Official on X, <https://support.ftx.com/>, and correspondence from official email addresses <https://support.ftx.com/hc/en-us/articles/19223337707412-Official-Email-Addresses> as they become available.

Thank you for understanding.

FTX Customer Support



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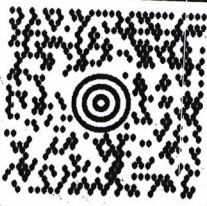
Case 22-1008-K

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